

IN THE MATTER OF SALARY ARBITRATION BETWEEN:

DERICK BRASSARD

-AND-

THE NEW YORK RANGERS

SUBMISSION ON BEHALF OF THE NEW YORK RANGERS

TEAM 21

I. INTRODUCTION AND OVERVIEW.....	1
A. Inconsistent Offensive Production.....	1
B. Lack of Meaningful Contribution to Post-Season Success.....	2
II. VALID COMPARABLE PLAYERS.....	4
A. Bryan Little – Winnipeg Jets.....	4
B. Sam Gagner – Edmonton Oilers (Playform Year)	5
C. Mats Zuccarello – New York Rangers.....	7
III. CONCLUSION.....	8

I. INTRODUCTION AND OVERVIEW

This brief will examine the performance record of the New York Rangers' Derick Brassard, in conformity with section 12.9 of the NHL Collective Bargaining Agreement.¹ The value that Mr. Brassard brings to the club is marred by his inconsistent and erratic point production, as well as his mediocre contribution to the Rangers' latest Stanley Cup playoff drive. As such, the New York Rangers respectfully submit that Mr. Brassard is entitled to \$4.5 million in annual compensation – below the \$5.0 million midpoint figure.²

A. Inconsistent Offensive Production

Mr. Brassard's offensive skill set has oft been an asset to the Rangers, but he has not established himself as a true offensive leader. Mr. Brassard has yet to achieve the '20 goal, 50 point season' – a colloquial milestone of elite NHL forwards such as Logan Couture, Patrice Bergeron and Bryan Little.³ Mr. Brassard's inconsistent point production and erratic performance has been a significant limitation on his offensive value and potential for the Rangers hockey club.

Upon his arrival from the Columbus Blue Jackets in the 2012-2013 regular season, Mr. Brassard provided no immediate offensive spark to the Rangers: he scored only 3 goals in his first 23 contests.⁴ Eventually, Mr. Brassard settled into a more stable pattern of point production and ultimately emerging with an average of 0.85 points per game since joining the Rangers (ranked third on the team).⁵

As the 2013-2014 season took off though, Mr. Brassard again demonstrated his inability to consistently produce offensively over the course of a season. His average point production per

¹ NHL Collective Bargaining Agreement, 2012, s.12.

² <http://capgeek.com/player/593>

³ <http://www.nhl.com/ice/teamstats>

⁴ <http://www.nhl.com/ice/playerstats>

⁵ *Ibid.*

game fell to 0.56 (down from 0.85 in his time with the Rangers the previous season).⁶ Out of 81 games played, Mr. Brassard registered one shot or less in 32 games – in fact, he failed to register any shots at all in 12 of these contests.⁷ Similarly, Mr. Brassard went over eight games without scoring a goal at three points in the season in November, December and January.⁸ Between December 20, 2013 and January 29, 2014, he managed to score only 2 goals in 20 games.⁹ Moreover, he went eight games without any points at all in the month of March 2013, at a critical period in the determination of team playoff rankings. Conversely, Mr. Brassard also exhibits erratic streaks of significant offensive production, such as when he tallied one point-per-game in eight games beginning on January 26, 2014.¹⁰ Though Mr. Brassard has shown sparks of offensive competence, his performance has been wildly unpredictable and does not merit a \$5 million award.

B. Lack of Meaningful Contribution to Post-Season Success

The New York Rangers are a competitive and successful franchise, having made playoff appearances in the past four consecutive seasons. This season in particular, the Rangers had an exceptional playoff run with a total of 25 games played, reaching a Stanley Cup final which culminated in a six-game series (with three overtime games) versus the Los Angeles Kings.¹¹ Yet, in such a deep playoff berth, Mr. Brassard was virtually a non-factor.

After a solid playoff performance in 2012-2013, expectations were high for Mr. Brassard's playoff contributions - but his regular season instability had become a trend.¹² In the Rangers' 2013-2014 Stanley Cup run, Mr. Brassard only recorded 12 points in 23 games (0.52

⁶ *Ibid.*

⁷ *Ibid.*

⁸ (November 29-December 18; December 20-January 10; January 14-January 29)

⁹ *Ibid.*

¹⁰ *Ibid.*

¹¹ <http://www.nhl.com/ice/teamstats>

¹² <http://www.nhl.com/ice/playerstats>

points per game as compared to his regular season average of 0.56)¹³. The Rangers scored 64 goals throughout their entire playoff berth, meaning that Mr. Brassard had an impact on under 20% of the team's offence. In the opening seven-game series against Philadelphia, Mr. Brassard only tallied two points (both assists) while his team scored 19 goals in the series.¹⁴

Overall, Mr. Brassard's contribution to the team's playoff success was intermittent at best. He failed to register a point in 14 of 23 playoff games played and missed two further games in the Montreal series with a hand injury. In short, Mr. Brassard did not contribute to the Rangers' offence in 16 of 25 games (64% of New York's playoff contests).¹⁵ With regards to the remaining, non-consecutive nine games in which Mr. Brassard recorded a total 12 points, this total included three points (2 goals, 1 assist) from a 5-1 victory over the Pittsburgh Penguins on May 9, 2014 – hardly a close game or critical contributions.¹⁶ In fact, Mr. Brassard failed to even register a shot in two of his playoff appearances, games in which he played 22 and 21 shifts respectively.¹⁷

In addition to his unreliable point production, Mr. Brassard did not live up to his regular season powerplay success in the post-season. During the regular season, Mr. Brassard was a leader for the Rangers with seven powerplay goals and an average powerplay time on ice of 2:31 minutes. Conversely, Mr. Brassard ended the playoffs with zero powerplay goals despite having more opportunity to capitalize with an increased average powerplay time on ice of 3:01 minutes.¹⁸ Simultaneously, the Rangers' powerplay would not enjoy the same conversion rate it had during the regular season, as it dropped from an 18.2% scoring percentage to 12.6% in

¹³ *Ibid.*

¹⁴ *Ibid.*

¹⁵ *Ibid.*

¹⁶ *Ibid.*

¹⁷ *Ibid.*

¹⁸ *Ibid.*

playoffs.¹⁹ Overall, the Rangers would fail to capitalize on 90 powerplay opportunities throughout the course of their 2013-2014 playoff berth.²⁰ Mr. Brassard's failure to meet expectations during this season's playoff games further limits his value for the team.

II. VALID COMPARABLE PLAYERS

A. Bryan Little – Winnipeg Jets:

The club submits that Mr. Brassard is a comparable player to Bryan Little of the Winnipeg Jets, who was signed to an annual midpoint salary of \$4.7 million in the summer of 2013.²¹ Mr. Brassard and Mr. Little are both centres, were both drafted in 2006, and perform similarly in terms of offensive production. However, Mr. Little plays a much more critical role for the Jets: he is a first-line player with by far the highest time on ice of any centre on his team.²² Mr. Little recorded an average of 19:47 minutes on the ice per game in his platform season of 2012-2013. The next Jets centre Olli Jokinen comes in a distant second place with an average of 17:07 minutes on-ice per game.²³ Mr. Brassard, on the other hand, played an average of only 15:47 minutes in 2013-2014, giving him the third-highest ice time of any centre on his team, and only the seventh of all forwards for the Rangers.²⁴

Although both centres are capable of producing offensively, Mr. Little's point production surpasses that of Mr. Brassard – reflecting the increased role that the Jets centre fulfills for his team. In the shortened 2012-2013 lockout season, Mr. Little scored 32 points in 48 games (points-per-game ratio of 0.67) – significantly more than Mr. Brassard's record of 45 points in 81 games and 0.56 points-per-game ratio in 2013-2014.²⁵

¹⁹ <http://www.nhl.com/ice/teamstats>

²⁰ *Ibid.*

²¹ <http://capgeek.com/player/342>

²² <http://www.nhl.com/ice/teamstats>

²³ *Ibid.*

²⁴ *Ibid.*

²⁵ *Ibid.*

Moreover, Mr. Little has proven himself as a more well-rounded forward than Mr. Brassard. In addition to his superior points-per-game production, Mr. Little also contributes to Winnipeg's defensive performance. For example, he plays an important role in his team's shorthanded play, recording an average of 1:32 minutes on the ice during the penalty kill in his platform year.²⁶ Conversely, Mr. Brassard was not selected by New York's coaching staff to play in these critical situations during the 2013-2014 season, as illustrated by his virtually nil 0:01 average time on ice during the penalty kill.²⁷

Given the discrepancy in points-per-game production, time on ice, and overall role on their respective teams, it would not be justified for Mr. Brassard to receive a higher salary than Mr. Little. The Rangers thus submits that Mr. Brassard's salary should not be higher than that of a first line centre such as Mr. Little who earns \$4.7 million per year.²⁸ An annual salary of \$4.5 million would be better reflective of the role Mr. Brassard fulfills for the team.

B. Sam Gagner – Edmonton Oilers (Platform Year):

We submit that Mr. Brassard is a comparable player to Sam Gagner of the Edmonton Oilers, who earned a midpoint salary of \$4.8 million after his platform season of 2012-2013²⁹. The two centres have followed a similar trajectory over the long-term. For example, both were sixth overall draft picks – Mr. Brassard in 2006 and Mr. Gagner in 2007.³⁰ Moreover, at the conclusion of their respective platform years, both had similar career averages in regular season points-per-game records (0.56 for Mr. Brassard and 0.62 for Mr. Gagner).³¹ However, in their

²⁶ <http://www.nhl.com/ice/playerstats>

²⁷ *Ibid.*

²⁸ <http://capgeek.com/player/342>

²⁹ <http://capgeek.com/player/23>

³⁰ <http://www.nhl.com/ice/playerstats>

³¹ <http://www.nhl.com/ice/careerstats>

platform years, Mr. Gagner was responsible for a more significant role on the Oilers, as exemplified by his average TOI of 19:24 (as compared to Mr. Brassard's TOI of 15:47).³²

Despite the fact that Mr. Gagner's platform year occurred during the lockout-shortened season in 2012-2013, his record was consistently stronger than that of Mr. Brassard. Mr. Gagner recorded 38 points in 48 games for a points-per-game average of 0.79 in 2012-2013, compared to 29 points over 47 games and an average of 0.62 points-per-game for Mr. Brassard.³³ Moreover, Mr. Gagner achieved this superior record in a season where the Oilers did not make the playoffs, whereas Mr. Brassard benefitted from membership on a much stronger team.³⁴

While both players have been strong on the powerplay, Mr. Gagner's record is superior overall. For example, 10 out of his 15 powerplay points in 2012-2013 were scored against stronger teams than Edmonton, with records better than 0.500.³⁵ Mr. Gagner was tied for 1st in powerplay points on the Oilers that season, notably trailed by players such as Taylor Hall, Ryan Nugent-Hopkins, Nail Yakupov and Jordan Eberle.³⁶ In fact, 44% of Edmonton's total powerplay points in 2012-2013 were either scored or assisted by Mr. Gagner³⁷. Mr. Brassard, on the other hand, was only the 7th-ranked powerplay point producer for New York in the 2012-2013 season.³⁸ Although Mr. Brassard did improve in 2013-2014 with his 18 powerplay points out of the Rangers' total of 48, Mr. Gagner's record in his platform year was still stronger.³⁹

Notwithstanding their similar career trajectories, Mr. Gagner's overall record has been superior to Mr. Brassard's in almost all aspects of play. In his platform year, Mr. Gagner distinguished himself as a strong point producer, which propelled him to the role of a top-three

³² <http://www.nhl.com/ice/playerstats>

³³ *Ibid.*

³⁴ *Ibid.*

³⁵ *Ibid.*

³⁶ <http://www.nhl.com/ice/teamstats>

³⁷ *Ibid.*

³⁸ *Ibid.*

³⁹ *Ibid.*

forward with an average of 19:24 minutes of play per game; Mr. Brassard's minutes position him as a bottom-six forward.⁴⁰ Accordingly, we submit that Mr. Brassard should be entitled to a lower salary than Mr. Gagner's \$4.8 million per year due to Mr. Gagner's superior and consistent offensive performance – and the differing roles both players fulfill.⁴¹

C. Mats Zuccarello – New York Rangers:

We submit that Mr. Brassard is a comparable player to fellow New York Rangers forward Mats Zuccarello, who earns a midpoint salary of \$3.5 million per year.⁴² Both players are 27 years old, but Mr. Zuccarello has only one full season of experience in the NHL – which came during his platform year of 2013-2014.⁴³

Although Mr. Brassard is a centre and Mr. Zuccarello is a left-winger, both players enjoy a similar amount of time on the ice per game with 15:47 and 17:08 minutes, respectively. Moreover, they play a highly comparable number of shifts per game at 21.5 for Mr. Brassard and 22.5 for Mr. Zuccarello, with both players frequently slotted as linemates.⁴⁴ Both Mr. Brassard and Mr. Zuccarello play similar, predominantly offensive roles for the Rangers. For example, they saw relatively high power play time per game at 2:31 and 2:36 minutes, respectively.⁴⁵ Conversely, they saw little penalty kill time with 0:01 minutes for Mr. Brassard and 0:33 for Mr. Zuccarello in the same season.⁴⁶

Despite their strikingly similar roles on the Rangers, Mr. Zuccarello has made a much more significant impact in his short time with the Rangers, scoring 59 points in 77 games for an

⁴⁰ <http://www.nhl.com/ice/playerstats>

⁴¹ <http://capgeek.com/player/23>

⁴² <http://capgeek.com/player/1777>

⁴³ <http://www.nhl.com/ice/playerstats>

⁴⁴ *Ibid.*

⁴⁵ *Ibid.*

⁴⁶ *Ibid.*

impressive points-per-game average of 0.77 in the 2013-2014 season.⁴⁷ Mr. Brassard, on the other hand, scored only 45 points in 81 games in 2013-2014, for a points-per-game average of 0.56.⁴⁸ In fact, Mr. Zuccarello led the New York Rangers in points in the regular season, while Mr. Brassard was only the 4th highest-producing player last year.⁴⁹ Mr. Zuccarello has also proven himself to be a shootout specialist: he succeeded in three out of four attempts in 2013-2014, including two game winning shootout goals.⁵⁰ Mr. Brassard missed his sole shootout attempt in 2013-2014.⁵¹

Though the frequent linemates play similar minutes and are expected to provide comparable offensive production, Mr. Zuccarello has provided a greater contributor to the team's overall success. Accordingly, we submit that a radically higher salary for Mr. Brassard would be unjust. A \$4.5 million award is appropriate in accounting for Mr. Brassard's additional years of NHL experience coupled with his subpar offensive performance in comparison to that of Mr. Zuccarello.

III. CONCLUSION

Though Mr. Brassard contributes to the Rangers' offense, he does not do so consistently. His point production has been erratic and his impact on the team's playoff success this year was all but negligible. More importantly, players within the \$5 million salary range outshine Mr. Brassard in a number of areas of play; such an award is simply not proportional to the role Mr. Brassard has fulfilled as an offensive, third-line centre and bottom-six forward. Consequently, the New York Rangers submit that an award of \$4.5 million per season is fair and more reflective of Mr. Brassard's play.

⁴⁷ *Ibid.*

⁴⁸ *Ibid.*

⁴⁹ <http://www.nhl.com/ice/teamstats>

⁵⁰ <http://www.nhl.com/ice/playerstats>

⁵¹ <http://www.nhl.com/ice/playerstats>